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2 United States Attorney

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
11

12 UNITED STATES OF AMERICA, )

13 Plaintiff, )

14 v. )

15 )  
16 )  
17 )  
18 **RAYMON D. HILL** )  
a/k/a "Money Ray," )

19 **DENNIS CYRUS, Jr.** )  
a/k/a "Daddy-O," )

20 **AQUIL H. PETERSON** )  
a/k/a "Quil," )

21 **LESTER W. HOGAN** )  
a/k/a "Styles," )

22 **STEVE WILSON** )  
a/k/a "Wolf," a/k/a "Solo," )

23 **DONALD J. ARMOUR** )  
a/k/a "DJ," )

24 **MISTER MEILLEUR** )  
a/k/a "Mister," )

25 Defendants. )  
26 )

No.

VIOLATIONS: 21 U.S.C. § 846 –  
Conspiracy to Possess with Intent to  
Distribute and Distribute 50 Grams or  
More of Cocaine Base; 18 U.S.C.  
§1962(d) – Conspiracy to Participate in a  
Racketeer Influenced and Corrupt  
Organization; 18 U.S.C. § 1959 –  
Violent Crime in Aid of Racketeering;  
21 U.S.C. § 841(a)(1) – Possession with  
Intent to Distribute, and Distribution of,  
Cocaine Base; 21 U.S.C. § 860(a) –  
Possession for Distribution of Cocaine  
Base Within 1,000 Feet of a Public  
Elementary School, a Public Housing  
Facility and a Playground; 18 U.S.C.  
§ 924(c)(1)(A) & (iii) – Using, Carrying  
and Possessing Firearm During and in  
Relation to Crime of Violence; 18 U.S.C.  
§ 1512(a)(1)(A) & (C) – Witness  
Murder; 18 U.S.C. § 1513(a)(1)(A) &  
(B) – Witness Retaliation; 18 U.S.C.  
§ 1503(a) – Obstruction of Justice;  
18 U.S.C. § 2 – Aiding and Abetting.

SAN FRANCISCO VENUE

27  
28 INDICTMENT

1 The Grand Jury charges:

2 **COUNT ONE:** (21 U.S.C. § 846 – Conspiracy to Distribute and Possess with Intent to  
3 Distribute 50 Grams or More of Cocaine Base)

4 **NARCOTICS CONSPIRACY**

5 A. **The Conspiracy**

6 From in or about some time no later than 1994, the exact date being unknown to  
7 the Grand Jury, and continuing thereafter up to and including May 2005, in the Northern  
8 District of California and elsewhere, the defendants,

9 **RAYMON D. HILL**  
10 **a/k/a “Money Ray,”**  
11 **DENNIS CYRUS, Jr.,**  
12 **a/k/a “Daddy-O,”**  
13 **AQUIL H. PETERSON**  
14 **a/k/a “Quil,”**  
15 **LESTER W. HOGAN**  
16 **a/k/a “Styles,”**  
17 **STEVE WILSON**  
18 **a/k/a “Wolf,” a/k/a “Solo,”**  
19 **DONALD J. ARMOUR**  
20 **a/k/a “DJ”**  
21 **MISTER MEILLEUR**  
22 **a/k/a**  
23 **“Mister,”**

24 and others known and unknown to the Grand Jury, knowingly and intentionally conspired  
25 to possess with intent to distribute and to distribute a Schedule II controlled substance, to  
26 wit: mixtures and substances containing a detectable amount of cocaine base, a Schedule  
27 II narcotic controlled substance, and the quantity of said mixtures and substances was  
28 fifty (50) grams or more, in violation of Title 21, United States Code, Sections 846 and  
841(b)(1)(A)(iii).

23 B. **Goals of the Conspiracy**

24 The conspiracy had the following goals and objectives:

25 (1) It was a principal goal of the conspiracy for the defendants and co-  
26 conspirators to obtain as much money and other things of value as possible through the  
27 trafficking of a controlled substance, namely cocaine base, also known as crack cocaine,  
28

1 in the Northern District of California.

2 (2) It was a further goal of the conspiracy to commit acts of assault, attempted  
3 murder, murder and other acts of violence for the following purposes, among others: to  
4 enrich the members of the conspiracy; to create, maintain and control a market place for  
5 the distribution of its controlled substances; to enforce discipline among members of the  
6 conspiracy; to collect monies owed to members of the conspiracy; to protect the  
7 conspiracy and its members from detection, apprehension and prosecution by law  
8 enforcement; to intimidate and prevent persons from testifying as witnesses in criminal  
9 prosecutions against members of the conspiracy; to prevent, thwart, and retaliate against  
10 acts of violence perpetrated by rivals against the conspiracy and its members; and to  
11 promote and enhance the reputation and standing of the conspiracy and its members.

12 C. Ways, Manner and Means To Accomplish the Conspiracy

13 The ways, manner and means by which the defendants and co-conspirators  
14 operated their illegal drug trafficking organization, included, but are not limited to, the  
15 following:

16 (1) The members of the conspiracy knowingly and intentionally distributed and  
17 possessed with intent to distribute cocaine base, and aided and abetted such distribution  
18 and possession with intent to distribute. The locations at which members of the  
19 conspiracy conducted their illegal narcotics business included generally the city of San  
20 Francisco, but with specific emphasis on the area in and around the Page Street public  
21 housing complex, in San Francisco's Western Addition or Fillmore District  
22 neighborhood, including, but not limited to, an area bounded by Buchanan Street to the  
23 East, Fillmore Street to the West, Page Street to the North and Haight Street to the South.

24 (2) It was part of the conspiracy that the defendants would and did play  
25 different roles in the conspiracy, take upon themselves different tasks and participate in  
26 the conduct of the organization through various criminal acts. The defendants made  
27 themselves and their services available at various times throughout the life of the  
28 conspiracy and participated in certain drug trafficking ventures as required to promote

1 and protect the distribution operation. The roles assumed by some defendants were  
2 interchangeable at various times throughout the conspiracy. Some of the roles assumed  
3 and carried out by the defendants included, among others, holder, lookout, supplier of  
4 drugs, organizer, enforcer, protector and street seller.

5 (3) It was further part of the conspiracy that cocaine base was stored, prior to  
6 distribution to customers, in and around designated “stash” locations. The defendants  
7 used these “stash” locations to store both cocaine base and weapons in order to prevent  
8 their being found by the police or rivals, and to hide the items’ connection to members of  
9 the conspiracy. Some of these “stash” locations were also used for processing, cutting,  
10 packaging, and distributing the organization’s cocaine base.

11 (4) It was further part of the conspiracy that the defendants and co-conspirators  
12 used telephones, including cellular and portable telephones, and beepers/pagers to  
13 facilitate their illegal narcotics business; that is, making telephone calls to communicate  
14 with each other, their suppliers and their customers, to direct or facilitate acts of violence  
15 in furtherance of the conspiracy (including acts of violence against rivals), and to protect  
16 against the detection of the conspiracy by law enforcement officials.

17 (5) It was further part of the conspiracy that the defendants and co-conspirators  
18 possessed, carried and used firearms, including semi-automatic pistols and revolvers, to  
19 protect their drug trafficking operation from theft, robbery and competition from rival  
20 sellers, and to do violence in furtherance of the conspiracy. These weapons were  
21 possessed, carried and used for various reasons, including, but not limited to: ensuring  
22 the personal safety of the members of the conspiracy; protecting the conspiracy’s illegal  
23 drugs, and the proceeds of drug distribution; intimidating rival drug dealers to keep them  
24 from distributing illegal drugs in the area of San Francisco, California that the conspiracy  
25 claimed to control; retaliating against real and perceived threats to the general reputation  
26 and respect of the conspiracy by outsiders; and ensuring that drug distribution activities  
27 within the area of San Francisco, California that the conspiracy claimed to control, were  
28 controlled by the defendants and their co-conspirators.

1 (6) It was further part of the conspiracy that the defendants and co-conspirators  
2 engaged in acts of violence, including murder, attempted murder, assault with firearms,  
3 and threatened acts of violence to protect themselves, to eliminate rival sellers, to retaliate  
4 for acts of violence against members of the conspiracy, to prevent potential witnesses  
5 from cooperating with law enforcement agencies, to prevent potential witnesses from  
6 testifying against members of the conspiracy at criminal proceedings, to conceal the  
7 conspiracy from law enforcement authorities, to promote and perpetuate the conspiracy's  
8 distribution operation and to enhance the conspiracy's reputation.

9 (7) It was further part of the conspiracy that its members took efforts to avoid  
10 detection, investigation by law enforcement authorities and conviction for criminal  
11 charges against any members of the conspiracy.

12 D. Overt Acts

13 In furtherance of the conspiracy and in order to effect the objects thereof, the  
14 defendants, unindicted co-conspirators, and others both known and unknown to the Grand  
15 Jury, in various combinations, directly and indirectly, within the Northern District of  
16 California, committed overt acts, including, but not limited to, the following:

17 (1) On or about September 5, 1994, **RAYMON D. HILL, a/k/a "Money**  
18 **Ray,"** attempted to rob United States currency from Shaunte Johnson, a/k/a Shaunte  
19 Spruell.

20 (2) On January 11, 1995, an unindicted co-conspirator distributed  
21 approximately 0.43 grams of cocaine base.

22 (3) On or about January 19, 1996, **DONALD J. ARMOUR, a/k/a "DJ,"**  
23 possessed with intent to distribute approximately 21.85 grams of cocaine base.

24 (4) On March 18, 1997, an unindicted co-conspirator possessed with intent to  
25 distribute approximately 5.72 grams of cocaine base.

26 (5) On or about March 20, 1997, **RAYMON D. HILL, a/k/a "Money Ray,"**  
27 possessed with intent to distribute approximately 173.66 grams of cocaine base.

28 (6) On July 4, 1997, **STEVE WILSON, a/k/a "Wolf," a/k/a "Solo,"**

1 possessed with intent to distribute approximately 2.06 grams of cocaine base.

2 (7) On or about March 15, 1998, **DONALD J. ARMOUR, a/k/a "DJ,"**  
3 possessed with intent to distribute approximately 9.68 grams of cocaine base.

4 (8) On or about December 30, 1998, **RAYMON D. HILL, a/k/a "Money**  
5 **Ray,"** possessed with intent to distribute approximately 84.50 grams of marijauna.

6 (9) On or about July 12, 1999, an unindicted co-conspirator possessed with the  
7 intent to distribute approximately 25.70 grams of cocaine base.

8 (10) On August 15, 1999, an unindicted co-conspirator possessed with intent to  
9 distribute approximately 26.40 grams of marijuana and approximately 3.23 grams of  
10 cocaine base.

11 (11) On January 5, 2000, within the Northern District of California, an  
12 unindicted co-conspirator possessed with intent to distribute approximately 0.45 grams of  
13 cocaine base.

14 (12) On January 5, 2000, **MISTER MEILLEUR, a/k/a "Mister,"** possessed  
15 with intent to distribute and distributed approximately 0.84 grams of cocaine base.

16 (13) On or about January 4, 2001, **LESTER W. HOGAN, a/k/a "Styles,"**  
17 possessed with intent to distribute approximately 5.24 grams of cocaine base.

18 \_\_\_\_\_(14) On February 10, 2001, an unindicted co-conspirator possessed with intent to  
19 distribute and distributed approximately 0.51 grams of cocaine base.

20 (15) On March 5, 2001, an unindicted co-conspirator possessed with intent to  
21 distribute approximately 0.68 grams of cocaine base.

22 (16) On or about July 14, 2001, **LESTER W. HOGAN, a/k/a "Styles,"**  
23 possessed with intent to distribute approximately 0.25 grams of cocaine base.

24 (17) On September 29, 2001, **LESTER W. HOGAN, a/k/a "Styles,"** attempted  
25 to murder and assaulted with a dangerous weapon causing serious bodily injury to, Terrell  
26 Trammell, by shooting him with a firearm.

27 (18) On October 25, 2001, an unindicted co-conspirator possessed with intent to  
28 distribute approximately 5.10 grams of cocaine base.

1 (19) On or about October 27, 2001, **MISTER MEILLEUR, a/k/a "Mister,"**  
2 possessed with intent to distribute approximately 4.66 grams of cocaine base.

3 (20) On December 19, 2001, an unindicted co-conspirator possessed a  
4 .38-caliber revolver.

5 (21) On March 26, 2002, **AQUIL H. PETERSON, a/k/a "Quil,"** distributed  
6 approximately 0.23 grams of cocaine base.

7 (22) On July 28, 2002, **DENNIS CYRUS, Jr., a/k/a "Daddy-O,"** attempted to  
8 murder Marcus Atkinson by shooting him with a 9-mm Sig Sauer semi-automatic pistol.

9 (23) On or about August 9, 2002, **MISTER MEILLEUR, a/k/a "Mister,"**  
10 possessed with intent to distribute approximately 4.52 grams of cocaine base.

11 (24) On August 24, 2002, **AQUIL H. PETERSON, a/k/a "Quil,"** possessed  
12 with intent to distribute approximately 31.04 grams of cocaine base.

13 (25) On August 31, 2002, **DENNIS CYRUS, Jr., a/k/a "Daddy-O"** murdered  
14 Randy Mitchell by shooting him with a 9-mm Smith & Wesson semi-automatic pistol.

15 (26) On August 31, 2002, **DENNIS CYRUS, Jr., a/k/a "Daddy-O,"** possessed  
16 with intent to distribute approximately 5.88 grams of cocaine base.

17 (27) On November 26, 2002, an unindicted co-conspirator possessed with intent  
18 to distribute approximately 0.49 grams of cocaine base and 9.80 grams of marijuana.

19 (28) On February 8, 2003, an unindicted co-conspirator possessed with intent to  
20 distribute approximately 6.58 grams of cocaine base.

21 (29) On or about February 21, 2003, **DONALD J. ARMOUR, a/k/a "DJ,"**  
22 possessed a 9-mm Glock handgun, \$4000, a "Tangent" brand scale and plastic bags.

23 (30) On or about February 13, 2004, an unindicted co-conspirator possessed with  
24 intent to distribute approximately 0.26 grams of cocaine base.

25 (31) On or about and between August 23, 2004 and August 26, 2004, **LESTER**  
26 **W. HOGAN, a/k/a "Styles," RAYMON D. HILL, a/k/a "Money Ray,"** and an  
27 unindicted co-conspirator, conspired to murder Travis Trammel.

28 (32) On August 26, 2004, **STEVE WILSON, a/k/a "Wolf," a/k/a "Solo,"** and

1 an unindicted co-conspirator, conspired to commit murder, attempted to murder and  
2 assaulted with a dangerous weapon causing serious bodily injury to, Randy Minor, by  
3 shooting him with a handgun.

4 (33) On August 26, 2004, **STEVE WILSON, a/k/a “Wolf,” a/k/a “Solo,”** and  
5 an unindicted co-conspirator, assaulted with a dangerous weapon causing serious  
6 bodily injury to, Pedro Raigoza, by shooting him with a handgun.

7 **COUNT TWO:** (18 United States Code, Section 1962(d) – Conspiracy to Participate in  
8 a Racketeer Influenced and Corrupt Organization)

9 **RICO CONSPIRACY**

10 A. **The Enterprise**

11 (1) At all times relevant to this Indictment, the defendants, and others not  
12 named in this Indictment, were members and associates of “PAGE STREET,” sometimes  
13 referred to as “PST,” “778” or “Page Street Mob,” a violent street gang that was based in  
14 the Northern District of California, particularly in the Western Addition neighborhood in  
15 the City and County of San Francisco and elsewhere. PAGE STREET, including its  
16 leadership, membership and associates, constituted an “enterprise,” as defined by Title 18,  
17 United States Code, Section 1961(4) (hereinafter “the enterprise”), that is, a group of  
18 individuals associated in fact. The enterprise constituted an ongoing organization whose  
19 members functioned as a continuing unit for a common purpose of achieving the  
20 objectives of the enterprise. This enterprise was engaged in, and its activities affected,  
21 interstate and foreign commerce.

22 (2) At all times relevant to this Indictment, a principal goal of the enterprise  
23 was to commit murders, attempted murders, and other acts of violence for the following  
24 purposes, among others: enriching the enterprise and its members; creating, maintaining  
25 and controlling a market place for the distribution of its controlled substances; enforcing  
26 discipline among members of the enterprise; protecting the enterprise and its members  
27 from detection, apprehension and prosecution by law enforcement; intimidating and  
28 preventing persons from testifying as witnesses in criminal prosecutions against members



1 of the enterprise, and others; preventing, thwarting, and retaliating against acts of  
2 violence perpetrated by rivals against the enterprise and its members; retaliating against  
3 real and perceived threats to the general respect and reputation of the enterprise and  
4 members thereof in the community; and promoting and enhancing the reputation and  
5 standing of the enterprise and its members. It was a further goal of the enterprise to  
6 obtain money and other things of value through the trafficking of controlled substances,  
7 including cocaine base, marijuana, and ecstasy.

8 B. The RICO Conspiracy

9 (3) From in or about sometime in at least 1994, the exact date being unknown  
10 to the Grand Jury, and continuing thereafter up to and including in or about May 2005, in  
11 the Northern District of California and elsewhere, the defendants

12 **RAYMON D. HILL**  
13 **a/k/a "Money Ray,"**  
14 **DENNIS CYRUS, Jr.,**  
15 **a/k/a "Daddy-O,"**  
16 **AQUIL H. PETERSON**  
17 **a/k/a "Quil,"**  
18 **LESTER W. HOGAN**  
19 **a/k/a "Styles,"**  
20 **STEVE WILSON**  
21 **a/k/a "Wolf," a/k/a "Solo,"**

22 together with other persons known and unknown, being persons employed by and  
23 associated with PAGE STREET, an enterprise which engaged in, and the activities of  
24 which affected, interstate and foreign commerce, unlawfully, knowingly and intentionally  
25 combined, conspired, confederated and agreed with each other, and with persons known  
26 and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1962(d),  
27 that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of  
28 the enterprise through a pattern of racketeering activity, as that term is defined in Title 18,  
United States Code, Sections 1961(1) and 1961(5). The pattern of racketeering activity  
through which the defendants agreed to conduct the affairs of the enterprise consisted of  
the acts set forth below in Paragraph 4 of this Count of the Indictment.

C. The Pattern of Racketeering Activity

(4) The pattern of racketeering activity, as defined in Title 18, United States

Code, Sections 1961(1) and 1961(5) consists of the following acts:

**Racketeering Act 1**

From in or about some time no later than 1994, the exact date being unknown to the Grand Jury, and continuing thereafter up to and including April 2005, in the Northern District of California and elsewhere, the defendants, **RAYMON D. HILL, a/k/a “Money Ray,” DENNIS CYRUS, Jr., a/k/a “Daddy-O,” AQUIL H. PETERSON, a/k/a “Quil,” LESTER W. HOGAN, a/k/a “Styles,” STEVE WILSON, a/k/a “Wolf,” a/k/a “Solo,”** and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together, with each other, and with co-conspirators not indicted herein, to possess with intent to distribute and to distribute narcotic controlled substances, including a Schedule II controlled substance, to wit:

(1) Mixtures and substances containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II narcotic controlled substance, and the quantity of said mixtures and substances was fifty (50) grams or more, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

(2) Mixtures and substances containing a detectable amount of cannabis, also known as marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(3) Mixtures and substances containing a detectable amount of ecstasy, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**Racketeering Act 2**

On March 20, 1997, within the Northern District of California, PAGE STREET gang member **RAYMON D. HILL, a/k/a “Money Ray,”** possessed with intent to distribute approximately 173 grams of cocaine base, in violation of Title 21, United States Code, Section 841(a)(1).

**Racketeering Act 3**

On July 4, 1997, within the Northern District of California, PAGE STREET gang

1 member **STEVE WILSON, a/k/a “Wolf,” a/k/a “Solo,”** possessed with intent to  
2 distribute approximately 2.06 grams of cocaine base, in violation of Title 21, United  
3 States Code, Section 841(a)(1).

4 **Racketeering Act 4**

5 On February 6, 1998, within the Northern District of California, PAGE STREET  
6 gang member **STEVE WILSON, a/k/a “Wolf,” a/k/a “Solo,”** attempted to commit the  
7 murder of Mark Banks, in violation of California Penal Code Sections 664 and 187(a).

8 **Racketeering Act 5**

9 On December 30, 1998, within the Northern District of California, PAGE  
10 STREET gang member **RAYMON D. HILL, a/k/a “Money Ray,”** possessed with intent  
11 to distribute approximately 84.5 grams of marijuana, in violation of Title 21, United  
12 States Code, Section 841(a)(1).

13 **Racketeering Act 6**

14 The defendants named below committed the following acts, any one of which  
15 alone constitutes the commission of Racketeering Act 6:

16 (A) Beginning on an unknown date in or about 2001, and continuing to September 29,  
17 2001, within the Northern District of California, PAGE STREET gang members  
18 **RAYMON D. HILL, a/k/a “Money Ray,” and LESTER W. HOGAN, a/k/a “Styles,”**  
19 unlawfully and knowingly conspired to murder Terrell Trammell, in violation of  
20 California Penal Code Sections 182 and 187(a).

21 In furtherance of this conspiracy and to effect the object thereof, **RAYMON D.**  
22 **HILL, a/k/a “Money Ray” and LESTER W. HOGAN, a/k/a “Styles,”** and co-  
23 conspirators not indicted herein, committed the following overt acts in the Northern  
24 District of California:

25 (1) On September 29, 2001, Lester W. Hogan armed himself with a handgun;

26 (2) On September 29, 2001, Lester W. Hogan proceeded to the 300 block of  
27 Haight Street in San Francisco, California.

28 (B) On September 29, 2001, within the Northern District of California, **RAYMON D.**

1 **HILL, a/k/a “Money Ray,” and LESTER W. HOGAN, a/k/a “Styles,”** unlawfully  
2 attempted to murder Terrell Trammell, in violation of California Penal Code Sections 664  
3 and 187(a).

4 **Racketeering Act 7**

5 On March 26, 2002, within the Northern District of California, PAGE STREET  
6 gang member **AQUIL PETERSON, a/k/a “Quil,”** possessed with intent to distribute  
7 and distributed approximately 0.23 grams of cocaine base, in violation of Title 21, United  
8 States Code, Section 841(a)(1).

9 **Racketeering Act 8**

10 \_\_\_\_\_ On July 28, 2002, within the Northern District of California, PAGE STREET gang  
11 member **DENNIS CYRUS, Jr., a/k/a “Daddy-O,”** unlawfully attempted to murder  
12 Marcus Atkinson, in violation of California Penal Code Sections 664 and 187(a).

13 **Racketeering Act 9**

14 The defendants named below committed the following acts, any of which alone  
15 constitutes the commission of Racketeering Act 10:

16 (a) On August 23, 2002, within the Northern District of California, PAGE  
17 STREET gang members **DENNIS CYRUS, Jr., a/k/a “Daddy-O,” and AQUIL H.**  
18 **PETERSON, a/k/a “Quil,”** did unlawfully murder, with malice aforethought, Joseph  
19 Hearn by shooting him with a .44-caliber Desert Eagle semi-automatic pistol, in  
20 violation of California Penal Code Section 187(a).

21 (b) On August 23, 2002, within the Northern District of California, PAGE  
22 STREET gang members **DENNIS CYRUS, Jr., a/k/a “Daddy-O,” and AQUIL H.**  
23 **PETERSON, a/k/a “Quil,”** kidnaped Joseph Hearn, in violation of California Penal  
24 Code Section 207(a).

25 **Racketeering Act 10**

26 On August 24, 2002, within the Northern District of California, PAGE STREET  
27 gang member **AQUIL H. PETERSON, a/k/a “Quil,”** possessed with intent to distribute  
28 approximately 31.04 grams of cocaine base, in violation of Title 21, United States Code,

1 Section 841(a)(1).

2 **Racketeering Act 11**

3 On August 31, 2002, within the Northern District of California, PAGE STREET  
4 gang member **DENNIS CYRUS, Jr., a/k/a “Daddy-O,”** unlawfully murdered Randy  
5 Mitchell with malice aforethought, in violation of California Penal Code Section 187(a).

6 **Racketeering Act 12**

7 On August 31, 2002, within the Northern District of California, PAGE STREET  
8 gang member **DENNIS CYRUS, Jr., a/k/a “Daddy-O,”** possessed with intent to  
9 distribute approximately 5.88 grams of cocaine base, in violation of Title 21, United  
10 States Code, Section 841(a)(1).

11 **Racketeering Act 13**

12 On September 8, 2002, within the Northern District of California, PAGE STREET  
13 gang member **DENNIS CYRUS, Jr., a/k/a “Daddy-O,”** did unlawfully murder Ray  
14 Jimmerson, with malice aforethought, in violation of California Penal Code Section  
15 187(a).

16 **Racketeering Act 14**

17 The defendants below, committed the following acts, anyone of which alone,  
18 constitute the commission of Racketeering Act 14:

19 (A) Beginning on an unknown date no later then August 23, 2004, and continuing  
20 through August 26, 2004, within the Northern District of California, PAGE STREET  
21 gang members **STEVE WILSON, a/k/a “Wolf,” a/k/a “Solo,” RAYMON D. HILL,**  
22 **a/k/a “Money Ray” and LESTER W. HOGAN, a/k/a “Styles,”** and an unindicted co-  
23 conspirator, unlawfully conspired to murder Randy Minor, in violation of California  
24 Penal Code Sections 182 and 187(a).

25 In furtherance of this conspiracy and to effect the object thereof, **STEVE**  
26 **WILSON, a/k/a “Wolf,” a/k/a “Solo,” RAYMON D. HILL, a/k/a “Money Ray” and**  
27 **LESTER W. HOGAN, a/k/a “Styles,”** and co-conspirators not indicted herein  
28 committed the following overt acts in the Northern District of California:

1 (1) On or about August 23, 2004, **RAYMON D. HILL** conversed with  
2 **LESTER W. HOGAN** and encouraged **LESTER W. HOGAN** to locate and murder  
3 Randy Minor;

4 (2) On August 26, 2004, **STEVE WILSON** armed himself with a handgun and  
5 drove with an unindicted co-conspirator to the 500 Block of Haight Street in San  
6 Francisco, California.

7 (B) On August 26, 2004, within the Northern District of California, PAGE  
8 STREET gang member **STEVE WILSON**, a/k/a “Wolf,” a/k/a “Solo,” and an  
9 unindicted co-conspirator, unlawfully attempted to murder Randy Minor, in violation of  
10 California Penal Code Sections 664 and 187(a).

11 (C) On August 26, 2004, within the Northern District of California, PAGE  
12 STREET gang member **STEVE WILSON**, a/k/a “Wolf,” a/k/a “Solo,” and an  
13 unindicted co-conspirator, unlawfully attempted to murder Pedro Raigoza, in violation of  
14 California Penal Code Sections 664 and 187(a).

15 **Racketeering Act 15**

16 On or about and between August 23, 2004 and August 26, 2004, within the  
17 Northern District of California, PAGE STREET gang members **LESTER W. HOGAN**,  
18 a/k/a “Styles,” **RAYMON D. HILL**, a/k/a “Money Ray,” and an unindicted co-  
19 conspirator, conspired to murder Travis Trammel, with malice aforethought, in violation  
20 of California Penal Code Sections 182 and 187(a).

21 In furtherance of this conspiracy and to effect the object thereof, **RAYMON D.**  
22 **HILL**, a/k/a “Money Ray” and **LESTER W. HOGAN**, a/k/a “Styles,” and co-  
23 conspirators not indicted herein, committed the following overt acts in the Northern  
24 District of California:

25 (1) On August 24, 2004, **LESTER W. HOGAN**, a/k/a “Styles,” armed  
26 himself with a handgun;

27 (2) On August 25, 2004, **LESTER W. HOGAN**, a/k/a “Styles,” armed  
28 himself with a handgun.

1 **COUNT THREE:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid  
2 of Racketeering)

3 The defendants named below committed the following violent crime in aid of  
4 racketeering activity:

5 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
6 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and  
7 incorporated by reference as though set forth fully herein, constituted an enterprise as  
8 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals  
9 associated in fact which was engaged in, and the activities of which affected, interstate  
10 and foreign commerce.

11 (2) At all times relevant to this Indictment, the above-described enterprise,  
12 through its members and associates, engaged in racketeering activity as defined in Title  
13 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
14 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
15 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
16 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
17 182, 187(a), 664 and 189.

18 (3) On or about September 29, 2001, in the Northern District of California, as  
19 consideration for the receipt of, and as consideration for a promise and an agreement to  
20 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
21 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
22 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

23 **RAYMON D. HILL**  
24 **a/k/a “Money Ray,” and**  
**LESTER W. HOGAN**  
25 **a/k/a “Styles,”**

26 unlawfully and knowingly conspired to murder Terrell Trammell, in violation of  
27 California Penal Code Sections 182 and 187(a).

28 In furtherance of this conspiracy and to effect the object thereof, **RAYMON D.**  
**HILL, a/k/a “Money Ray” and LESTER W. HOGAN, a/k/a “Styles,”** and co-

1 conspirators not indicted herein committed the following overt acts in the Northern  
2 District of California:

3 (1) On September 29, 2001, Lester W. Hogan armed himself with a handgun;

4 (2) On September 29, 2001, Lester W. Hogan proceeded to the 300 block of  
5 Haight Street in San Francisco, California.

6 All in violation of Title 18, United States Code, Section 1959(a)(5).

7 **COUNT FOUR:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of  
8 Racketeering)

9  
10 The defendants named below committed the following violent crime in aid of  
11 racketeering activity:

12 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
13 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and  
14 incorporated by reference as though set forth fully herein, constituted an enterprise as  
15 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals  
16 associated in fact which was engaged in, and the activities of which affected, interstate  
17 and foreign commerce.

18 (2) At all times relevant to this Indictment, the above-described enterprise,  
19 through its members and associates, engaged in racketeering activity as defined in Title  
20 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
21 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
22 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
23 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
24 187(a), 182 and 664.

25 (3) On or about September 29, 2001, in the Northern District of California, as  
26 consideration for the receipt of, and as consideration for a promise and an agreement to  
27 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
28 entrance to and maintaining and increasing their position in the enterprise, an enterprise



engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

**RAYMON D. HILL**  
**a/k/a "Money Ray," and**  
**LESTER W. HOGAN**  
**a/k/a "Styles,"**

unlawfully and knowingly attempted to murder, Terrell Trammell, in violation of California Penal Code Sections 187(a) and 664.

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(5).

**COUNT FIVE:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of Racketeering)

The defendants named below committed the following violent crime in aid of racketeering activity:

(1) At all times relevant to this Indictment, the racketeering enterprise, as more fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

(2) At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, and acts involving murder, in violation of California Penal Code Sections 187(a), 182 and 664.

(3) On or about September 29, 2001, in the Northern District of California, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing their position in the enterprise, an enterprise

engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

**RAYMON D. HILL**  
**a/k/a "Money Ray," and**  
**LESTER W. HOGAN**  
**a/k/a "Styles,"**

unlawfully and knowingly assaulted Terrell Trammell with a dangerous weapon, in violation of California Penal Code Section 245(a)(2).

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

**COUNT SIX:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of Racketeering)

The defendant named below committed the following violent crime in aid of racketeering activity:

(1) At all times relevant to this Indictment, the racketeering enterprise, as more fully described in Paragraph A of Count Two Indictment, which is re-alleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

(2) At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, and acts involving murder, in violation of California Penal Code Sections 187(a), 189 and 664.

(3) On or about July 28, 2002, in the Northern District of California, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise

engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

**DENNIS CYRUS, Jr., a/k/a “Daddy-O,”**

and an unindicted co-conspirator did, unlawfully and knowingly attempt to murder, Marcus Atkinson, in violation of California Penal Code Sections 187(a) and 664.

All in violation of Title 18, United States Code, Section 1959(a)(5).

**COUNT SEVEN:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of Racketeering)

The defendant named below committed the following violent crime in aid of racketeering activity:

(1) At all times relevant to this Indictment, the racketeering enterprise, as more fully described in Paragraph A of Count Two this Indictment, which is re-alleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

(2) At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, and acts involving murder, in violation of California Penal Code Sections 187(a), 189 and 664.

(3) On or about July 28, 2002, in the Northern District of California, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

**DENNIS CYRUS, Jr., a/k/a “Daddy-O,”**

1 and an unindicted co-conspirator did, unlawfully and knowingly , assault with a  
2 dangerous weapon Marcus Atkinson, in violation of California Penal Code Sections  
3 245(a)(2).

4 All in violation of Title 18, United States Code, Section 1959(a)(3).

5 **COUNT EIGHT:** (Title 18, United States Code, Section 1959 – Violent Crime In Aid  
6 Of Racketeering).

7 The defendants named below committed the following violent crime in aid of  
8 racketeering activity:

9 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
10 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and  
11 incorporated by reference as though set forth fully herein, constituted an enterprise as  
12 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals  
13 associated in fact which was engaged in, and the activities of which affected, interstate  
14 and foreign commerce.

15 (2) At all times relevant to this Indictment, the above-described enterprise,  
16 through its members and associates, engaged in racketeering activity as defined in Title  
17 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
18 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
19 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
20 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
21 187(a), 189 and 664.

22 (3) On or about August 23, 2002, in the Northern District of California, as  
23 consideration for the receipt of, and as consideration for a promise and an agreement to  
24 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
25 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
26 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

27 **DENNIS CYRUS, Jr.,**  
28 **a/k/a “Daddy-O,” and**  
**AQUIL H. PETERSON**  
**a/k/a “Quil,”**

1 and others unknown to the Grand Jury, did unlawfully and knowingly murder Joseph  
2 Hearn, in violation of California Penal Code Sections 187(a).

3 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

4 **COUNT NINE:** (Title 18, United States Code, Section 1959 – Violent Crime In Aid  
5 Of Racketeering).

6 The defendants named below committed the following violent crime in aid of  
7 racketeering activity:

8 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
9 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and  
10 incorporated by reference as though set forth fully herein, constituted an enterprise as  
11 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals  
12 associated in fact which was engaged in, and the activities of which affected, interstate  
13 and foreign commerce.

14 (2) At all times relevant to this Indictment, the above-described enterprise,  
15 through its members and associates, engaged in racketeering activity as defined in Title  
16 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
17 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
18 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
19 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
20 187(a), 189 and 664.

21 (3) On or about August 23, 2002, in the Northern District of California, as  
22 consideration for the receipt of, and as consideration for a promise and an agreement to  
23 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
24 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
25 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

26 **DENNIS CYRUS, Jr.,**  
27 **a/k/a “Daddy-O,” and**  
**AQUIL H. PETERSON**  
28 **a/k/a “Quil,”**

1 and others unknown to the Grand Jury, unlawfully and knowingly kidnaped Joseph  
2 Hearn, in violation of California Penal Code Sections 207(a).

3 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

4 **COUNT TEN:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of  
5 Racketeering)

6 The defendant named below committed the following violent crime in aid of  
7 racketeering activity:

8 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
9 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and  
10 incorporated by reference as though set forth fully herein, constituted an enterprise as  
11 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals  
12 associated in fact which was engaged in, and the activities of which affected, interstate  
13 and foreign commerce.

14 (2) At all times relevant to this Indictment, the above-described enterprise,  
15 through its members and associates, engaged in racketeering activity as defined in Title  
16 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
17 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
18 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
19 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
20 187(a), 189 and 664.

21 (3) On or about August 31, 2002, in the Northern District of California, as  
22 consideration for the receipt of, and as consideration for a promise and an agreement to  
23 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
24 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
25 engaged in racketeering activity, as set forth more fully Count Two of this Indictment,

26 **DENNIS CYRUS, Jr.,**  
27 **a/k/a “Daddy-O,”**

28 did unlawfully and knowingly murder Randy Mitchell, in violation of California Penal

1 Code Section 187(a).

2 All in violation of Title 18, United States Code, Section 1959(a)(1).

3 **COUNT ELEVEN:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid  
4 of Racketeering)

5 The defendant named below committed the following violent crime in aid of  
6 racketeering activity:

7 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
8 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and  
9 incorporated by reference as though set forth fully herein, constituted an enterprise as  
10 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals  
11 associated in fact which was engaged in, and the activities of which affected, interstate  
12 and foreign commerce.

13 (2) At all times relevant to this Indictment, the above-described enterprise,  
14 through its members and associates, engaged in racketeering activity as defined in Title  
15 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
16 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
17 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
18 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
19 187(a), 189 and 664.

20 (3) On or about September 8, 2002, in the Northern District of California, as  
21 consideration for the receipt of, and as consideration for a promise and an agreement to  
22 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
23 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
24 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

25 **DENNIS CYRUS, Jr.,**  
26 **a/k/a “Daddy-O,”**

27 did unlawfully and knowingly murder Ray Jimmerson, in violation of California Penal  
28 Code Section 187(a).

1 All in violation of Title 18, United States Code, Section 1959(a)(1).

2 **COUNT TWELVE:** (18 United States Code, Sections 1512(a)(1)(A) & (C) – Witness  
3 Murder)

4 On or about September 8, 2002, in the Northern District of California, the  
5 defendant,

6 **DENNIS CYRUS, Jr.,**  
7 **a/k/a “Daddy-O,”**

8 killed Ray Jimmerson, with intent to prevent his attendance and testimony in an official  
9 proceeding and to prevent communication by him to a law enforcement officer and judge  
10 of the United States of information relating to the commission or possible commission of  
11 a Federal offense, in violation of Title 18, United States Code, Sections 1512(a)(1)(A) &  
12 (C).

13 **COUNT THIRTEEN:** (18 United States Code, Sections 1513(a)(1)(A) & (B) – Witness  
14 Retaliation)

15 On or about September 8, 2002, in the Northern District of California, the  
16 defendant,

17 **DENNIS CYRUS, Jr.,**  
18 **a/k/a “Daddy-O,”**

19 killed Ray Jimmerson, with intent to retaliate against Ray Jimmerson for his attendance  
20 as a witness at an official proceeding, for his testimony given in an official proceeding,  
21 and for providing to a law enforcement officer information relating to the commission  
22 and possible commission of a Federal offense, in violation of Title 18, United States  
23 Code, Sections 1513(a)(1)(A) & (B).

24 **COUNT FOURTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in  
25 Aid of Racketeering)

26 The defendants named below committed the following violent crime in aid of  
27 racketeering activity:

28 (1) At all times relevant to this Indictment, the racketeering enterprise, as more



1 fully described in Count Two of this Indictment, which is realleged and incorporated by  
2 reference as though set forth fully herein, constituted an enterprise as defined in Title 18,  
3 United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact  
4 which was engaged in, and the activities of which affected, interstate and foreign  
5 commerce.

6 (2) At all times relevant to this Indictment, the above-described enterprise,  
7 through its members and associates, engaged in racketeering activity as defined in Title  
8 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
9 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
10 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
11 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
12 187(a), 189 and 664.

13 (3) Beginning on an unknown date no later than August 23, 2004, and  
14 continuing to on or about August 26, 2004, in the Northern District of California, as  
15 consideration for the receipt of, and as consideration for a promise and an agreement to  
16 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
17 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
18 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

19 **RAYMON D. HILL**  
20 **a/k/a "Money Ray,"**  
21 **LESTER W. HOGAN**  
22 **a/k/a "Styles,"**  
23 **STEVE WILSON**  
24 **a/k/a "Wolf"**

25 and an unindicted co-conspirator, did unlawfully and knowingly conspire to murder  
26 Randy Minor, in violation of California Penal Code Sections 182 and 187(a).

27 In furtherance of this conspiracy and to effect the object thereof, **RAYMON D.**  
28 **HILL, a/k/a "Money Ray," LESTER W. HOGAN, a/k/a "Styles," and STEVE**  
**WILSON, a/k/a/ "Wolf" or "Solo,"** and co-conspirators not indicted herein committed  
the following overt acts in the Northern District of California:

1 (1) On August 26, 2004, **STEVE WILSON** armed himself with a handgun;

2 (2) On August 26, 2004, **STEVE WILSON** proceeded to the 500 block of  
3 Haight Street in San Francisco, California.

4 All in violation of Title 18, United States Code, Section 1959(a)(5).

5 **COUNT FIFTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in  
6 Aid of Racketeering)

7 The defendant named below committed the following violent crime in aid of  
8 racketeering activity:

9 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
10 fully described in Count Two of this Indictment, which are re-alleged and incorporated by  
11 reference as though set forth fully herein, constituted an enterprise as defined in Title 18,  
12 United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact  
13 which was engaged in, and the activities of which affected, interstate and foreign  
14 commerce.

15 (2) At all times relevant to this Indictment, the above-described enterprise,  
16 through its members and associates, engaged in racketeering activity as defined in Title  
17 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
18 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
19 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
20 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
21 187(a), 189 and 664.

22 (3) On or about August 26, 2004, in the Northern District of California, as  
23 consideration for the receipt of, and as consideration for a promise and an agreement to  
24 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
25 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
26 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

27 **STEVE WILSON**  
28 **a/k/a “Wolf”**

1 and an unindicted co-conspirator, did unlawfully and knowingly commit the crime of  
2 maiming on Randy Minor, in violation of California Penal Code Sections 203.

3 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(2).

4 **COUNT SIXTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in  
5 Aid of Racketeering)

6 The defendant named below committed the following violent crime in aid of  
7 racketeering activity:

8 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
9 fully described in Count Two of this Indictment, which are re-alleged and incorporated by  
10 reference as though set forth fully herein, constituted an enterprise as defined in Title 18,  
11 United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact  
12 which was engaged in, and the activities of which affected, interstate and foreign  
13 commerce.

14 (2) At all times relevant to this Indictment, the above-described enterprise,  
15 through its members and associates, engaged in racketeering activity as defined in Title  
16 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
17 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
18 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
19 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
20 187(a), 189 and 664.

21 (3) On or about August 26, 2004, in the Northern District of California, as  
22 consideration for the receipt of, and as consideration for a promise and an agreement to  
23 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
24 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
25 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

26  
27 **STEVE WILSON**  
28 **a/k/a “Wolf”**

1 and an unindicted co-conspirator, did unlawfully and knowingly commit the crime of  
2 assault with a dangerous weapon on Randy Minor, in violation of California Penal Code  
3 Sections 245(a)(2).

4 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

5 **COUNT SEVENTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in  
6 Aid of Racketeering)

7 The defendant named below committed the following violent crime in aid of  
8 racketeering activity:

9 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
10 fully described in Count Two of this Indictment, which are re-alleged and incorporated by  
11 reference as though set forth fully herein, constituted an enterprise as defined in Title 18,  
12 United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact  
13 which was engaged in, and the activities of which affected, interstate and foreign  
14 commerce.

15 (2) At all times relevant to this Indictment, the above-described enterprise,  
16 through its members and associates, engaged in racketeering activity as defined in Title  
17 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
18 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
19 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
20 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
21 187(a), 189 and 664.

22 (3) On or about August 26, 2004, in the Northern District of California, as  
23 consideration for the receipt of, and as consideration for a promise and an agreement to  
24 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining  
25 entrance to and maintaining and increasing their position in the enterprise, an enterprise  
26 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

27 **STEVE WILSON**  
28 **a/k/a “Wolf”**

1 and an unindicted co-conspirator, did unlawfully and knowingly assault with a dangerous  
2 weapon Pedro Raigoza, in violation of California Penal Code Section 245(a)(2).

3 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

4 **COUNT EIGHTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in  
5 Aid of Racketeering)

6 The defendants named below committed the following violent crime in aid of  
7 racketeering activity:

8 (1) At all times relevant to this Indictment, the racketeering enterprise, as more  
9 fully described in Paragraph D of Count One and Count Two of this Indictment, which  
10 are re-alleged and incorporated by reference as though set forth fully herein, constituted  
11 an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a  
12 group of individuals associated in fact which was engaged in, and the activities of which  
13 affected, interstate and foreign commerce.

14 (2) At all times relevant to this Indictment, the above-described enterprise,  
15 through its members and associates, engaged in racketeering activity as defined in Title  
16 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the  
17 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise  
18 dealing in a controlled substance, in violation of Title 21, United States Code, Sections  
19 841 and 846, and acts involving murder, in violation of California Penal Code Sections  
20 187(a), 189 and 664.

21 (3) On or about and between August 23, 2004 and August 26, 2004, in the  
22 Northern District of California, as consideration for the receipt of, and as consideration  
23 for a promise and an agreement to pay, anything of pecuniary value from the enterprise,  
24 and for the purpose of gaining entrance to and maintaining and increasing their position  
25 in the enterprise, an enterprise engaged in racketeering activity, as set forth more fully in  
26 Count Two of this Indictment,

27 **RAYMON D. HILL**  
28 **a/k/a “Money Ray,”**  
**LESTER W. HOGAN**

a/k/a “Styles,”

and an unindicted co-conspirator, unlawfully and knowingly conspired to murder Travis Trammel, in violation of California Penal Code Sections 182 and 187.

In furtherance of this conspiracy and to effect the object thereof, **RAYMON D. HILL, a/k/a “Money Ray” and LESTER W. HOGAN, a/k/a “Styles,”** and co-conspirators not indicted herein committed the following overt acts in the Northern District of California:

(1) On August 24, 2004, Lester W. Hogan armed himself with a handgun;

(2) On August 25, 2004, Lester W. Hogan armed himself with a handgun.

All in violation of Title 18, United States Code, Sections 1959(a)(5).

**COUNT NINETEEN:** (Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) -- Possession with Intent to Distribute Cocaine Base)

On or about March 26, 2002, in the Northern District of California, the defendant

**AQUIL H. PETERSON**  
a/k/a “Quil”

knowingly and intentionally distributed a Schedule II controlled substance, to wit, approximately 0.23 grams of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).

**COUNT TWENTY:** (Title 21, United States Code, Section 860(a) – Possession for Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public Housing Facility and a Playground)

On or about March 26, 2002, in the Northern District of California, the defendant

**AQUIL H. PETERSON**  
a/k/a “Quil”

knowingly violated Title 21, United States Code, Section 841(a)(1) by distributing and possessing with the intent to distribute cocaine base, within one thousand feet of a public elementary school, and a housing facility owned by a public housing authority, and a playground, in violation of Title 21, United States Code, Section 860(a).

1 **COUNT TWENTY-ONE:** (Title 21, United States Code, Sections 841(a)(1) &  
2 (b)(1)(C) – Possession with Intent to Distribute Cocaine Base)

3 On or about August 9, 2002, in the Northern District of California, the defendant

4 **MISTER MEILLEUR**  
5 **a/k/a “Mister”**

6 knowingly and intentionally possessed with intent to distribute a Schedule II controlled  
7 substance, to wit, approximately 4.52 grams of cocaine base, in violation of Title 21,  
8 United States Code, Sections 841(a)(1) & (b)(1)(C).

9 **COUNT TWENTY-TWO:** (Title 21, United States Code, Section 860(a) – Possession  
10 for Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a  
11 Public Housing Facility and a Playground)

12 On or about August 9, 2002, in the Northern District of California, the defendant

13 **MISTER MEILLEUR**  
14 **a/k/a “Mister”**

15 knowingly violated Title 21, United States Code, Section 841(a)(1) by possessing with the  
16 intent to distribute cocaine base within one thousand feet of a public elementary school,  
17 and a housing facility owned by a public housing authority, and a playground, in violation  
18 of Title 21, United States Code, Section 860(a).

19 **COUNT TWENTY-THREE:** (Title 21, United States Code, Sections 841(a)(1) &  
20 (b)(1)(B)(iii) – Possession with Intent to Distribute Cocaine Base)

21 On or about August 24, 2002, in the Northern District of California, the defendant

22 **AQUIL H. PETERSON**  
23 **a/k/a “Quil”**

24 knowingly and intentionally possessed with intent to distribute a Schedule II controlled  
25 substance, to wit, approximately 30.73 grams of cocaine base, in violation of Title 21,  
26 United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).

27 **COUNT TWENTY-FOUR:** (Title 21, United States Code, Section 860(a) – Possession  
28 for Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a  
Public Housing Facility and a Playground)

1 On or about August 24, 2002, in the Northern District of California, the defendant

2 **AQUIL H. PETERSON**  
3 **a/k/a "Quil"**

4 knowingly violated Title 21, United States Code, Section 841(a)(1) by possessing with the  
5 intent to distribute cocaine base within one thousand feet of a public elementary school,  
6 and a housing facility owned by a public housing authority, and a playground, in violation  
7 of Title 21, United States Code, Section 860(a).

8 **COUNT TWENTY-FIVE:** (Title 21, United States Code, Sections 841(a)(1) &  
9 (b)(1)(B)(iii) – Possession with Intent to Distribute Cocaine Base)

10 On or about August 31, 2002, in the Northern District of California, the defendant

11 **DENNIS CYRUS, Jr.,**  
12 **a/k/a "Daddy-O"**

13 knowingly and intentionally possessed with intent to distribute a Schedule II controlled  
14 substance, to wit, approximately 5.88 grams of cocaine base, in violation of Title 21,  
15 United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).

16 **COUNT TWENTY-SIX:** (Title 21, United States Code, Section 860(a) – Possession for  
17 Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public  
18 Housing Facility and a Playground)

19 On or about August 31, 2002, in the Northern District of California, the defendant

20 **DENNIS CYRUS, Jr.,**  
21 **a/k/a "Daddy-O"**

22 knowingly violated 21 U.S.C. § 841(a)(1) by possessing with the intent to distribute  
23 cocaine base, within one thousand feet of a public elementary school, and a housing  
24 facility owned by a public housing authority, and a playground, in violation of Title 21,  
25 United States Code, Section 860(a).

26 **COUNTS TWENTY-SEVEN TO THIRTY-FOUR:** (18 U.S.C. § 924(c)(1)(A)(i) –  
27 Using, Carrying and Possessing Firearm During and in Relation to Crime of Violence)

28 (1) On or about the dates set forth below, in the Northern District of California,



the defendants named below did possess a firearm while committing the specified crimes of violence as set forth in the specified counts of this indictment which are re-alleged and incorporated by reference as if fully set forth herein:

<u>CT</u>	<u>DATE</u>	<u>DEFENDANT(S)</u>	<u>PREDICATE VICAR OFFENSE(S)</u>	<u>FOUND IN COUNT(S)</u>
27	9/29/01	<b>LESTER W. HOGAN</b>	18 U.S.C. § 1959 (Victim: Terrell Trammell)	4, 5
28	7/28/02	<b>DENNIS CYRUS, Jr.</b>	18 U.S.C. §1959 (Victim: Marcus Atkinson)	6, 7
29	8/23/02	<b>DENNIS CYRUS, Jr., AQUIL PETERSON</b>	18 U.S.C. § 1959 (Victim: Joseph Hearn)	8
30	8/31/02	<b>DENNIS CYRUS, Jr.</b>	18 U.S.C. § 1959 (Victim: Randy Mitchell)	10
31	9/08/02	<b>DENNIS CYRUS, Jr.</b>	18 U.S.C. § 1959 (Victim: Ray Jimmerson)	11
32	8/23- 26/04	<b>STEVE WILSON</b>	18 U.S.C. § 1959 (Victim: Randy Minor)	14-16
33	8/26/04	<b>STEVE WILSON</b>	18 U.S.C. § 1959 (Victim: Pedro Raigoza)	17
34	8/23- 26/04	<b>LESTER W. HOGAN</b>	18 U.S.C. § 1959 (Victim: Travis Trammell)	18

**COUNT THIRTY-FIVE:** (Title 18, United States Code, Section 1503(a) – Obstruction of Justice)

On or about June 14, 2004, in the Northern District of California, the defendant,

**RAYMON D. HILL,  
a/k/a “Money Ray”**

corruptly endeavored to influence, obstruct and impede the due administration of justice in a proceeding before a United States Magistrate Judge, to wit: a hearing in which the

1 defendant requested temporary release from custody before the Honorable James Larson,  
2 in the matter of United States v. Raymon D. Hill, CR 03-0060 MJJ.

3 1. Specifically, RAYMON D. HILL represented to United States Magistrate  
4 Judge James Larson that he wished to be released to attend the funeral services and view  
5 the body of his deceased brother Eugene Hill, an immediate family member, when he  
6 knew that Eugene Hill was not his brother nor a member of his immediate family, in  
7 violation of Title 18, United States Code, Section 1503(a).

8 Notice of Special Findings

9 1. **DENNIS CYRUS, a/k/a “Daddy-O”**

10 a. The allegations set forth in Counts Eight, Ten, and Eleven, of this  
11 Indictment are hereby realleged as if fully set forth herein and incorporated by reference.

12 b. As to Counts Ten and Eleven of this Indictment, the defendant, **DENNIS**  
13 **CYRUS, a/k/a “Daddy-O,”**:

14 (1) was more than 18 years of age at the time of the offense (Title 18, United  
15 States Code, Section 3591(a));

16 (2) intentionally killed the victim (Title 18, United States Code, Section  
17 3591(a)(2)(A));

18 (3) intentionally inflicted serious bodily injury that resulted in the death of the  
19 victim (Title 18, United States Code, Section 3591(a)(2)(B));

20 (4) intentionally participated in an act, contemplating that the life of a person  
21 would be taken or intending that lethal force would be used in connection with a  
22 person, other than one of the participants in the offense, and the victim died as a  
23 direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and

24 (5) intentionally and specifically engaged in an act of violence, knowing that  
25 the act created a grave risk of death to a person, other than one of the participants  
26 in the offense, such that participation in the act constituted reckless disregard for  
27 human life and the victim died as a direct result of the act (Title 18, United States  
28 Code, Section 3591(a)(2)(D)); and

1 (6) in committing the offenses described in Counts Ten and Eleven of this  
2 Indictment, knowingly created a grave risk of death to one or more persons  
3 in addition to the victim of the offense (Title 18, United States Code,  
4 Section 3592(c)(5)).

5 c. As to Count Eight of this Indictment, the defendant, **DENNIS CYRUS,**  
6 **a/k/a “Daddy-O,”**:

7 (1) was more than 18 years of age at the time of the offense (Title 18, United  
8 States Code, Section 3591(a));

9 (2) intentionally killed the victim (Title 18, United States Code, Section  
10 3591(a)(2)(A));

11 (3) intentionally inflicted serious bodily injury that resulted in the death of the  
12 victim (Title 18, United States Code, Section 3591(a)(2)(B));

13 (4) intentionally participated in an act, contemplating that the life of a person  
14 would be taken or intending that lethal force would be used in connection with a  
15 person, other than one of the participants in the offense, and the victim died as a  
16 direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

17 (5) intentionally and specifically engaged in an act of violence, knowing that  
18 the act created a grave risk of death to a person, other than one of the participants  
19 in the offense, such that participation in the act constituted reckless disregard for  
20 human life and the victim died as a direct result of the act (Title 18, United States  
21 Code, Section 3591(a)(2)(D)); and

22 (6) in committing the offense described in Count Eight of this Indictment, the  
23 defendant committed the offense in an especially heinous, cruel, or depraved  
24 manner in that it involved torture or serious physical abuse to the victim (Title 18,  
25 United States Code, Section 3592(c)(6)).

26 2. **AQUIL PETERSON a/k/a “Quil”**

27 a. The allegations set forth in Count Eight of this Indictment are hereby  
28 realleged as if fully set forth herein and incorporated by reference.

1           b.       As to Count Eight of this Indictment, the defendant, **AQUIL PETERSON**,  
2 a/k/a “**Quil**,”:

3           (1)     was more then 18 years of age at the time of the offense (Title 18, United  
4 States Code, Section 3591(a));

5           (2)     intentionally killed the victim (Title 18, United States Code, Section  
6 3591(a)(2)(A));

7           (3)     intentionally inflicted serious bodily injury that resulted in the death of the  
8 victim (Title 18, United States Code, Section 3591(a)(2)(B));

9           (4)     intentionally participated in an act, contemplating that the life of a person  
10 would be taken or intending that lethal force would be used in connection with a  
11 person, other than one of the participants in the offense, and the victim died as a  
12 direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

13          (5)     intentionally and specifically engaged in an act of violence, knowing that  
14 the act created a grave risk of death to a person, other than one of the participants  
15 in the offense, such that participation in the act constituted reckless disregard for  
16 human life and the victim died as a direct result of the act (Title 18, United States  
17 Code, Section 3591(a)(2)(D)); and

1 (6) in committing the offense described in Count Eight of this Indictment, the  
2 defendant committed the offense in an especially heinous, cruel, or depraved  
3 manner in that it involved torture or serious physical abuse to the victim (Title 18,  
4 United States Code, Section 3592(c)(6)).

5  
6  
7 DATED:

KEVIN V. RYAN  
United States Attorney

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9  
10 \_\_\_\_\_  
EUMI L. CHOI  
Chief, Criminal Division

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12  
13 (Approved as to form: \_\_\_\_\_)  
14 AUSA Andrew M. Scoble  
AUSA Philip J. Kearney